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January 19, 1988

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Federal Communications Commission
Office of the Secretary

Mr. H. Walker Feaster
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

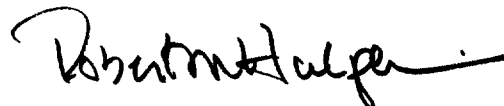
Re: MM Docket No. 87-268 ✓

Dear Mr. Feaster:

Transmitted herewith for filing with the Commission on behalf of the Station Representatives Association, Inc., are an original and six copies of its reply comments in the above-referenced docket.

Please communicate with this office if there are any questions regarding this matter.

Very truly yours,



Robert M. Halperin

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JAN 19 1980

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Advanced Television Systems)
and Their Impact on the)
Existing Broadcast Service)
)
Review of Technical and)
Operational Requirements:)
Part 73-E, Television)
Broadcast Stations)
)
Reevaluation of the UHF)
Television Channel and)
Distance Separation)
Requirements of Part 73 of)
the Commission's Rules)
)

MM Docket No. 87-268

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REPLY COMMENTS OF THE STATION
REPRESENTATIVES ASSOCIATION, INC.

The Station Representatives Association, Inc. ("SRA"), by its attorneys, hereby submits its reply comments in this proceeding.

SRA is a trade association of station representative firms which sell advertising for and provide management and programming advice to local broadcast stations. SRA is keenly interested in this proceeding because it believes that advanced television ("ATV") systems will have a significant impact on the way Americans receive entertainment and informational programming.

The implementation of ATV is a critically important task. Great improvement in the technical quality of television broadcasting is possible. The issues raised as to how ATV should be implemented are enormous in their number and complexity. SRA believes that, implemented carefully and appropriately, ATV can

satisfy consumer demand for a improved television technology. Thoughtlessly implemented, however, ATV could materially disserve the public interest.

SRA generally agrees with the comments filed by the Association of Maximum Service Telecasters ("MST") and the National Association of Broadcasters ("NAB") in this proceeding. It will not burden the Commission by repeating those comments, but does wish to emphasize a few particular points.

The system of free over-the-air television broadcasting, rooted in the Communications Act, has served this country well. It provides more Americans with their primary source of news than any other medium. Unlike alternative video media, such as cable television, direct-to-home broadcast satellite ("DBS") and videocassette recorders ("VCRs"), over-the-air television broadcasting is free and available to virtually all American households.^{1/} It provides entertainment and information in a manner that both responds to local needs and unites the country.

In regulating television broadcasting, the Commission has purported to follow the mandate of Congress by seeking to further fundamental public interest goals of competition, diversity, localism, and free, universally-available service.^{2/} As it wrestles with the ATV issues, it needs to keep those goals at the forefront.

^{1/} Scrambling of Satellite Television Signals, 2 FCC Rcd. 1669, 1691-92 (1987).

^{2/} See Initial Comments of MST at 10-17 (November 18, 1987).

ATV must be implemented in a manner that is competitive in quality with advanced video systems that will be used in other media, and compatible with the existing NTSC standard. Market-place competition sometimes follows the easy way, providing the cheapest goods and services to a majority of, but not all, users. The public interest follows no such course of least resistance. The Commission must insist, therefore, that equality and compatibility be insured for free television even if achieving them is more burdensome, expensive or time consuming than ignoring them.

Video media that compete with television broadcasting are likely to have little difficulty in providing advanced video technology. The Japanese Broadcasting Corporation ("NHK") has demonstrated the use of its MUSE system via satellite and VCR, and it appears that the MUSE system can also be implemented by cable television.^{3/} For television broadcasting to be able to compete fairly against these media, broadcasters will need to employ an ATV system that is of equal quality.

Consumers will demand, and the public interest requires, that free television not be a secondary quality, second class service. Were this to happen, local service and the public interest, which stand at the center of our U.S. broadcasting system, would be subverted, if not destroyed. The Communications Act, as interpreted by the Commission, places public interest programming

^{3/} Id. at 9, citing Multichannel News, October 12, 1987 at 1 and October 26, 1987 at 11.

responsibilities on broadcasters alone. No such obligations are imposed on other media. The Commission must insist on implementation of an ATV system that preserves those obligations and permits them to be met.

The National Cable Television Association, Inc. ("NCTA") has suggested in its comments that the Commission need not consider signal parity for free television.^{4/} NCTA's members, needless to say, would benefit mightily from being able to provide a signal materially better than that of local television stations. But such an unfair advantage would be contrary to public interest. The policies of diversity and competition require a level playing field. The policies of localism and free, universally-available service also require that local broadcasting not be relegated to a technically inferior status.

The Commission has noted that there are approximately 130 million television receivers in United States households.^{5/} These receivers -- which have been valued at \$80 billion^{6/}-- are designed to receive NTSC signals. It would clearly be counter to the public interest to render these receivers unusable.

The twin public interest goals of comparable quality and compatibility require the Commission now to conserve spectrum space for future ATV use. It is premature to speculate on ATV

^{4/} Comments of the National Cable Television Association, Inc. at 8 (November 18, 1987).

^{5/} Notice of Inquiry at ¶ 89.

^{6/} Initial Comments of MST at 4.

spectrum requirements.^{7/} Critical tests and analyses are now underway. The Commission's freeze on new and vacant television allotments, and its stay of efforts to force broadcasters to share UHF spectrum with land mobile services as proposed in General Docket No. 85-172 are sound and should be continued.

The Land Mobile Communications Council ("LMCC") urges that broadcasters not be allowed to develop and implement an ATV system that requires more than the 6 MHz bandwidth currently used by television broadcasters under the NTSC standard.^{8/} It believes that a 6 MHz ATV system is feasible and cites the advanced compatible television ("ACTV") technology being developed by the David Sarnoff Research Center ("Sarnoff").

SRA agrees that a compatible, 6 MHz ATV system would be desirable. At this point in time, however, it is not known whether such a system is technically feasible. Included in its comments, Sarnoff explains that its ACTV system is but an interim step towards a fully comparable ATV system. Sarnoff believes that additional spectrum will be necessary to implement an ATV system that will be satisfactory over the long term.^{9/} Thus, the Commission should not at this time take any actions which would reduce the availability of spectrum space for ATV systems.

^{7/} See Comments of the National Association of Broadcasters at 9 (November 19, 1987).

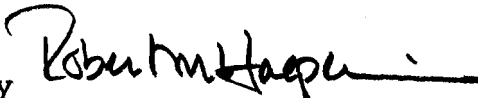
^{8/} Comments of the Land Mobile Communications Commission at 8-13 (November 18, 1987).

^{9/} Comments of the David Sarnoff Research Center, Inc. at 4 (November 18, 1987).

ATV is important to the future of the U.S. television system. The Commission has set out towards that future on a measured course. That course should be stayed.

Respectfully submitted,

THE STATION REPRESENTATIVES
ASSOCIATION, INC.

By 

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Its Attorneys

January 19, 1988

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments of the Station Representatives Association, Inc. was mailed first class this 19th day of January, 1988, to:

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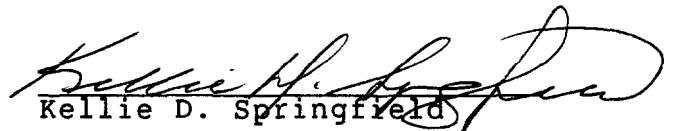
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Subscribed and sworn to before me this 19th day of January, 1988.

Notary Public for the State of New Jersey
My Commission Expires on 1/1/91


Kellie D. Springfield